

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

| | | |
|---------------------------------|---|---|
| VERNA IP HOLDINGS, LLC., |) | |
| Plaintiff, |) | |
| |) | Civil Action No. 6:21-cv-00422-ADA |
| v. |) | |
| |) | |
| |) | |
| ALERT MEDIA, INC. |) | Jury Trial Demanded |
| Defendant. |) | |

**MOTION TO QUASH NOTICE OF DEPOSITION OF
WILLIAM P. RAMEY, III**

Plaintiff VernaIP Holdings, LLC (“VernaIP”) respectfully moves the Court to quash the Notice of Deposition of William P. Ramey, III served October 20, 2023,¹ and would show good cause as follows:

1. Defendant Alert Media, Inc (“Alert”) served VernaIP’s counsel, Ramey LLP with the Notice on October 20, 2023, without conferring with the availability of the witness.
2. William P. Ramey, III (“Ramey”) is an attorney for VernaIP, LLC and managing partner at Ramey LLP. Ramey has no ownership interest in VernaIP or any of its patents. Ramey LLP has a contingent interest in revenues received from patent litigation.²
3. After receiving the deposition notice, Ramey e-mailed Philip Brown asking why Ramey was personally noticed.³
4. David Conrad responded that Alert wanted to be paid.
5. Ramey asked again why he was being deposed personally.

¹ Ex. A, October 21, 2023. Deposition Notice of William Ramey.

² Declaration of William P. Ramey, III (“Ramey Decl.”) at ¶3.

³ Ramey Decl. at ¶4.

6. Counsel for Alert responded that they would answer when VernaIP paid.
7. Counsel for Alert followed up the next day indicating that Ramey's deposition was necessary as Ramey is alleged to be involved in wrongdoing and is aware of the flow of settlement money.⁴

This Motion to Quash is filed the next business day after service of the Notice. Ramey's deposition notice should be quashed because Alert did not confer with counsel for VernaIP before serving the Notice. Alert should be required to specify why it is necessary to depose Ramey, an attorney for VernaIP. While it is true that Ramey LLP can testify about settlement proceeds it received and how they were distributed, the same information can be obtained from VernaIP, a party to the litigation. Alert's deposition notice is a fishing expedition designed to harass Ramey and Ramey LLP, counsel for the Plaintiff. Ramey requests that the Court quash Ramey's deposition attached as exhibit A. Alert is already deposing Luis Ortiz and Kermit Lopez from VernaIP. There is no reason to depose Ramey when Alert can obtain the information from Ortiz and Lopez.

Respectfully Submitted

Ramey LLP
/s/William P. Ramey
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Attorneys for Verna IP, LLC

CERTIFICATE OF SERVICE

⁴ Ramey Decl. at ¶5.

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served on this day of October 23, 2023, with a copy of the foregoing via e-mail.

/s/ William P. Ramey, III
William P. Ramey, III